

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.**_____

v.

DATE FILED: _____

HAROLD J. McCOY, III,
a/k/a "Hop,"
KARYNN R. LONG
DANIELLE BAKER

VIOLATIONS:

18 U.S.C. § 371 (conspiracy - 1 count)
18 U.S.C. §§ 1028(a)(7), (b)(1)(D) and
(c)(3)(A) (identity theft – 1 count)
18 U.S.C. § 2314 (interstate
transportation of counterfeited securities
- 4 counts)
18 U.S.C. § 1344 (bank fraud - 5 counts)
18 U.S.C. § 513 (uttering counterfeited
securities - 5 counts)
18 U.S.C. § 2 (aiding and abetting)
Notice of additional factors

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the following were organizations that operated in interstate commerce and whose activities affected interstate commerce:

- a. Ace Check Cashing
- b. American Red Cross
- c. The Belk Center, Inc.
- d. Circuit City, through First North American National Bank
- e. Citi Financial, Inc.

- f. Eddie Bauer, through First Consumers National Bank
- g. Elder Beerman
- h. Beneficial/Household Bank
- i. Berts Market
- j. Best Buy, through Household Bank
- k. Cashland
- l. Casual Male Big and Tall, through Household Bank
- m. Check Cashing
- n. Fifth Third Bank
- o. Gordon Jewelers, through Citibank South Dakota, NA
- p. Home Depot
- q. Honda East Power Sports, through Honda Financial Services
- r. J and R Personal Financial Services
- s. JC Penney, through GE Capital
- t. K and K Janowski, Inc.
- u. Kay Jewelers, through Sterling Jewelers
- v. King Financial Services
- w. The Kroger Company
- x. Littman Jewelers, through Citibank South Dakota, NA
- y. Marks and Morgan, through Sterling Jewelers
- z. Mayors Jewelers, through Wells Fargo
- aa. Osterman Jewelers, through Sterling Jewelers

- ab. Radio Shack, through Citibank South Dakota, NA
- ac. Reeds Jewelers, through World Financial Network National Bank
- ad. JB Robinson, through Sterling Jewelers
- ae. Rogers Jewelers, through Citi Corp Credit Services
- af. Rollins Market
- ag. Ross Simmons, through GE Retail Sales Finance
- ah. Santa Barbara Bank and Trust
- ai. Sears, through Citi Corp Credit Services
- aj. Shaws, through Sterling Jewelers
- ak. Super Duper Market
- al. United Check Cashing
- am. Walmart, through GE Capital
- an. Woodbury Power Sports, through Household Bank
- ao. Zales, through Citibank South Dakota, NA

2. At all times material to this indictment, defendant DANIELLE BAKER worked as a data entry clerk for the American Red Cross (“Red Cross”), at 700 Spring Garden Street in Philadelphia, Pennsylvania.

THE CONSPIRACY

3. From at least in or around August 2002 through in or around April 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**HAROLD J. McCOY, III,
a/k/a “Hop,”
KARYNN R. LONG, and**

DANIELLE BAKER

conspired and agreed, together and with others known and unknown to the grand jury, to commit the following offenses against the United States:

a. to knowingly and without lawful authority use a means of identification of other persons with the intent to commit violations of federal law, that is: (1) access device fraud, in violation of 18 U.S.C. § 1029(a)(2); (2) interstate transportation of counterfeited securities, in violation of 18 U.S.C. § 2314; (3) bank fraud, in violation of 18 U.S.C. § 1344; and (4) uttering counterfeited securities, in violation of 18 U.S.C. § 513, and in doing so, to obtain and attempt to obtain anything of value aggregating \$1,000 or more, that is, approximately \$268,762, in a one-year period, and to thereby affect interstate commerce, in violation of 18 U.S.C. §§ 1028(a)(7), (b)(1)(D), and (c)(3)(A);

b. to knowingly and with the intent to defraud use one or more unauthorized access devices during a one-year period, and by such conduct to obtain anything of value aggregating \$1,000 or more, that is, approximately \$268,762, during a one-year period, and to thereby affect interstate commerce, in violation of 18 U.S.C. § 1029(a)(2);

c. with unlawful and fraudulent intent, to transport in interstate commerce falsely made, forged, and counterfeited securities knowing such securities to have been falsely made, forged, and counterfeited, in violation of 18 U.S.C. § 2314;

d. to knowingly execute and attempt to execute a scheme to defraud a financial institution and to obtain monies owned by and under the care, custody, and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344; and

e. to knowingly make and utter counterfeited and forged securities of organizations that operate in, and the activities of which affect, interstate commerce, with the intent to deceive persons and organizations, in violation of 18 U.S.C. § 513.

MANNER AND MEANS

4. It was part of the conspiracy that defendants HAROLD J. McCOY, III, KARYNN R. LONG, DANIELLE BAKER, and others known and unknown to the grand jury stole identity information of numerous victims, including Red Cross blood donors from the Eastern District of Pennsylvania and elsewhere, and used that information to: (1) obtain credit at various merchants and use that credit to purchase merchandise; (2) create and negotiate counterfeit checks; and (3) obtain bank loans.

It was further part of the conspiracy that:

5. Sometime before August 26, 2002, while he was incarcerated in a federal prison, defendant HAROLD J. McCOY, III, obtained for future fraud activity identity information, such as names, birth dates, and social security numbers of fellow prisoners.

6. Sometime before August 26, 2002, at the direction of defendant HAROLD J. McCOY, III, defendant KARYNN R. LONG purchased computer equipment and software to produce counterfeit checks.

7. In or around August 2002, at the direction of defendant HAROLD J. McCOY, III, defendant KARYNN R. LONG stole from her place of employment checks drawn on various accounts of different companies for McCOY to use to produce counterfeit checks.

8. In or around August 2002, at the direction of defendant HAROLD J. McCOY, III, individuals known and unknown to the grand jury broke into vehicles to steal

identities that could be used for identity fraud activity.

9. Shortly after August 26, 2002, when defendant HAROLD J. McCOY, III, was released from a federal prison, he traveled with defendant KARYNN R. LONG to Philadelphia, Pennsylvania where they arranged for others known and unknown to the grand jury to assist them in identity fraud activity.

10. Beginning in or around September 2002, and at various times during the course of the conspiracy, at the direction of defendant HAROLD J. McCOY, III, defendant DANIELLE BAKER, then a Red Cross employee, stole from the Red Cross identity information of numerous individuals who had donated blood to the Red Cross during corporate blood drives (“blood donor victims”). McCOY and BAKER selected their victims based on their employment with companies that paid higher salaries, making it easier for defendants to obtain credit and higher levels of credit in the victims’ names. BAKER then provided to McCOY the stolen identity information, which included names, dates of birth, social security numbers, addresses, telephone numbers, and places of employment, for use in identity fraud activity.

11. Beginning in or around September 2002, and at various times during the course of the conspiracy, defendant HAROLD J. McCOY, III, produced counterfeit checks, many of which appeared to be drawn on the accounts of companies whose checks defendant KARYNN R. LONG had stolen, and made the counterfeit checks payable to individuals whose identities McCOY and others acting at his direction had stolen.

12. Beginning in or around September 2002, and at various times during the course of the conspiracy, defendants HAROLD J. McCOY, III, and KARYNN R. LONG, and others known and unknown the grand jury acting at the direction of McCOY, obtained false

photographic identifications in the names of those whose identities they had stolen.

13. From on or about September 3, 2002, to on or about November 14, 2002, defendants HAROLD J. McCOY, III, and KARYNN R. LONG, and others known and unknown to the grand jury acting at the direction of McCOY, traveled to various merchants and banks in Ohio and cashed, for thousands of dollars, numerous counterfeit checks that McCOY had produced and made payable to identity theft victims.

14. From on or about September 17, 2002, to on or about October 31, 2002, defendants HAROLD J. McCOY, III, and KARYNN R. LONG, and others known and unknown to the grand jury acting at the direction of McCOY, traveled to numerous merchants in Ohio where they fraudulently applied for and obtained instant credit in the names of individuals whose identities defendant DANIELLE BAKER had stolen from the Red Cross. To obtain the instant credit, McCOY and his cohorts used false photographic identifications and other identity information to pose as the identity theft victims.

15. From on or about September 17, 2002, to on or about October 31, 2002, defendants HAROLD J. McCOY, III, and KARYNN R. LONG, and others known and unknown to the grand jury acting at the direction of McCOY, used the instant credit they had fraudulently obtained in Ohio to purchase tens of thousands of dollars in merchandise, including jewelry, televisions, computers, other electronic equipment, clothing and gift cards.

16. Defendant HAROLD J. McCOY, III, compensated those who participated in the identity fraud activity at his direction with merchandise they had stolen together.

17. Defendant HAROLD J. McCOY, III, rented and used a storage locker in Trotwood, Ohio, to store the merchandise he and others stole in Ohio as part of their identity

fraud activity.

18. In or around November 2002, to evade law enforcement authorities whom they believed were looking for them in Ohio, and to relocate their fraudulent scheme, defendants HAROLD J. McCOY, III, and KARYNN R. LONG left Ohio and traveled to Philadelphia, Pennsylvania, which became their base of operations for crimes committed throughout the East Coast.

19. From in or around November 2002, through in or around early January 2003, defendants HAROLD J. McCOY, III, and KARYNN R. LONG traveled throughout the East Coast in, among other vehicles, a vehicle that defendant DANIELLE BAKER had rented for them in Philadelphia for their crime spree. During this time, McCOY and LONG traveled to numerous merchants in Pennsylvania, New Jersey, Connecticut, Virginia, North Carolina, Georgia, South Carolina, and Florida, where they fraudulently applied for and obtained instant credit in the names of Red Cross blood donor victims, and successfully purchased tens of thousands of dollars in merchandise using the stolen identities.

20. On or about December 9, 2002, to store some of his stolen merchandise, defendant HAROLD J. McCOY, III, rented a storage unit in Philadelphia, Pennsylvania. McCOY rented the unit in the name of one of his fraud victims whose identity he had assumed, an individual known to the grand jury and identified here as M.H.

21. In or around January 2003, defendants HAROLD J. McCOY, III, and KARYNN R. LONG returned to the Philadelphia area where McCOY created on his computer counterfeit cashier's checks purportedly drawn on a bank in California and made payable to M.H.. The checks purported to be "rapid refund" cashier's checks issued as loans in anticipation

of a federal tax refund, checks which are widely accepted at banks and check cashing agencies.

McCOY then cashed four of these fraudulent rapid refund cashier's checks in the Eastern District of Pennsylvania, generating thousands of dollars in fraud proceeds.

22. From early January through the end of March 2003, defendants HAROLD J. McCOY, III, and KARYNN R. LONG continued their instant credit card fraud activity at numerous merchants in New Jersey, Delaware, Maryland, Virginia, and Florida, where they purchased tens of thousands of dollars in merchandise using the stolen identities of numerous Red Cross blood donor victims.

23. In the middle of March 2003, defendant HAROLD J. McCOY, III, applied for and obtained loans from banks in New Jersey and Delaware in the name of an individual known to the grand jury and identified here as R.H., whose identity defendant DANIELLE BAKER had stolen from the Red Cross.

24. In or around late March and early April, 2003, after defendant HAROLD McCOY was arrested, defendant DANIELLE BAKER traveled to various locations in the Philadelphia area to remove and conceal merchandise that McCOY and his cohorts had stolen as part of their identity fraud scheme.

25. Through this fraud activity, using the identities of more than 40 victims in more than 170 illegal transactions, the defendants obtained approximately \$268,762 in cash and merchandise and caused the American Red Cross to lose necessary blood donations valued at over \$455,000.

OVERT ACTS

In furtherance of the conspiracy, defendants HAROLD J. McCOY, III, KARYNN R. LONG, and DANIELLE BAKER, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about September 3, 2002, at a Kroger grocery store in Dayton, Ohio, defendant HAROLD J. McCOY, III, cashed a counterfeit check made payable for \$446.83 to an identity theft victim known to the grand jury and identified here as A.T.

2. On or about September 6, 2002, at the Fifth Third Bank in Ohio, defendant HAROLD J. McCOY, III, opened a checking account in the name of an identity theft victim known to the grand jury and identified here as T.S. by presenting an Ohio Temporary Identification Card bearing the name of T.S. and the photograph of McCOY and a Social Security Card in the name of T.S.

3. On or about September 13, 2002, at the Oakley branch of the Fifth Third Bank in Ohio, defendant HAROLD J. McCOY, III, cashed a counterfeit check made payable to T.S. for \$992.69.

4. On or about September 17, 2002, at the direction of defendant HAROLD J. McCOY, III, an individual known to the grand jury and identified here as K.D., obtained instant credit in the name of an identity theft victim known to the grand jury and identified here as K.B., at a Best Buy in Dayton, Ohio, and purchased electronic equipment for \$2,609.97.

5. On or about October 1, 2002, at the direction of defendant HAROLD J. McCOY, III, defendant KARYNN R. LONG cashed a counterfeit check made payable to an identity theft victim known to the grand jury and identified here as S.V. for \$594.36, at a Kroger

grocery store in Dayton, Ohio.

6. On or about October 30, 2002, at Rogers Jewelers in Dayton, Ohio, defendant HAROLD J. McCOY, III, obtained instant credit in the name of a blood donor identity theft victim known to the grand jury and identified here as T.B., and used that instant credit to purchase jewelry for \$3,193.93.

7. On or about November 21, 2002, at Walmart in Philadelphia, Pennsylvania, defendant HAROLD J. McCOY, III, attempted to obtain instant credit in the name of a blood donor identity theft victim known to the grand jury and identified here as B.B.

8. On or about November 22, 2002, defendant DANIELLE BAKER rented a vehicle at Budget Rental Car at 30th and Market Streets in Philadelphia, Pennsylvania, for defendants HAROLD J. McCOY, III, and KARYNN J. LONG to use in their identity fraud scheme. BAKER listed as an authorized driver an identity theft victim known to the grand jury and identified here as V.M., whose identity McCOY used throughout this identity fraud scheme.

9. On or about December 12, 2002, at the direction of defendant HAROLD J. McCOY, III, defendant KARYNN R. LONG obtained instant credit in the name of a blood donor identity theft victim known to the grand jury and identified here as A.M., at Belk Stores in Orangeburg, South Carolina, and used that instant credit to purchase clothing for \$1,662.73.

10. On or about January 21, 2003, at Radio Shack in Deptford, New Jersey, defendant HAROLD J. McCOY, III, obtained instant credit in the name of a blood donor identity theft victim known to the grand jury and identified here as D.H., and used that instant credit to purchase electronic equipment for \$1,753.60.

11. On or about January 27, 2003, at Sears in Deptford, New Jersey, defendant

HAROLD J. McCOY, III, obtained instant credit in the name of a blood donor identity theft victim known to the grand jury and identified here as J.H., and used that instant credit to attempt to purchase computers valued at \$2,799.98.

12. On or about February 6, 2003, at United Check Cashing in Philadelphia, Pennsylvania, defendant HAROLD J. McCOY, III, cashed a counterfeit check made payable for \$2,311 to an identity theft victim known to the grand jury and identified here as M.H. by presenting a State of Ohio photographic identification card in the name of M.H. with the photograph of McCOY.

13. On or about February 27, 2003, at Zales in Leesburg, Florida, defendant HAROLD J. McCOY, III, obtained instant credit in the name of a blood donor identity theft victim known to the grand jury and identified here as J.B., and used that instant credit to purchase jewelry for \$4,322.42.

14. On or about March 17, 2003, at Woodbury Power Sports in Woodbury, New Jersey, defendant HAROLD J. McCOY, III, obtained financing in the name of a blood donor identity theft victim known to the grand jury and identified here as R.H., to purchase a motorcycle for \$8,394.

15. On or about March 17, 2003, at Citi Financial in West Berlin, New Jersey, defendant HAROLD J. McCOY, III, applied for and obtained a personal loan for \$7,499.92 in the name of R.H.

16. On or about March 24, 2003, at Circuit City in Lawrenceville, New Jersey, defendant HAROLD J. McCOY, III, obtained instant credit in the name of a blood donor identity theft victim known to the grand jury and identified here as C.C., and used that instant credit to

purchase computer equipment for \$2,692.37.

17. On or about March 25, 2003, at Honda East Power Sports in Bear, Delaware, defendant HAROLD J. McCOY, III, obtained financing for \$8,691 in the name of C.C. to purchase a motorcycle.

18. On or about April 3, 2003, to conceal evidence of the identity theft scheme after defendant HAROLD J. McCOY, III, was arrested, defendant DANIELLE BAKER traveled to Devon Storage in Philadelphia, Pennsylvania, to remove from a rental unit rented in the name of M.H. merchandise that McCOY and his cohorts had stolen as part of their identity fraud scheme.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count One are re-alleged here.
2. From at least in or around August 2002 through in or around April 2003, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

DANIELLE BAKER

knowingly transferred, without lawful authority, means of identification of other persons with the intent to commit, and to aid and abet, a violation of Federal law, that is, access device fraud, in violation of 18 U.S.C. § 1029(a)(2), by stealing from the American Red Cross means of identification (including names, social security numbers, and dates of birth) of numerous persons who had donated blood to the Red Cross during corporate blood drives and then knowingly providing such means of identification to others who obtained and attempted to obtain anything of value aggregating \$1,000 or more, that is, approximately \$218,770, in a one-year period and thereby affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(D), and (c)(3)(A), and 2.

COUNTS THREE THROUGH SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Defendants HAROLD J. McCOY, III, and KARYNN R. LONG, and others known and unknown to the grand jury stole identity information of numerous victims.
2. At the direction of defendant HAROLD J. McCOY, III, defendant KARYNN R. LONG purchased computer equipment and software to produce counterfeit checks.
3. At the direction of defendant HAROLD J. McCOY, III, defendant KARYNN R. LONG stole from her place of employment checks drawn on various different company accounts for McCOY to use to produce counterfeit checks.
4. Defendant HAROLD J. McCOY, III, produced counterfeit checks, some of which appeared to be drawn on the Santa Barbara Bank & Trust, all of which were made payable to individuals whose identities McCOY and others acting at his direction had stolen.
5. From on or about September 3, 2002, to on or about February 6, 2003, defendants HAROLD J. McCOY, III, and KARYNN R. LONG, and others known and unknown to the grand jury acting at the direction of McCOY, cashed and attempted to cash approximately 42 counterfeit checks totaling approximately \$37,822 at various merchants, banks, and check cashing agencies in the District of Ohio and the Eastern District of Pennsylvania.

6. On or about February 6, 2003, as described below, in furtherance of the scheme described here, in the Eastern District of Pennsylvania and elsewhere, defendants

**HAROLD J. McCOY, III,
a/k/a “Hop,” and
KARYNN R. LONG,**

with unlawful and fraudulent intent, willfully caused the transportation in interstate commerce, that is, from the Eastern District of Pennsylvania to Santa Barbara, California, for clearance, falsely made, forged, and counterfeited securities, that is, counterfeited cashier’s checks that appeared to be drawn on the Santa Barbara Bank & Trust and that were made payable for \$2,311.00, as set forth below, to an individual known to the grand jury and identified here as M.H., knowing such securities to have been falsely made, forged, and counterfeited:

<u>COUNT</u>	<u>LOCATION</u>	<u>CASHING AGENCY</u>	<u>CHECK NUMBER</u>
THREE	Bensalem, PA	Check Cashing	4601808
FOUR	Bensalem, PA	Ace Check Cashing	4601808
FIVE	Philadelphia, PA	King Financial Services	4601808
SIX	Philadelphia, PA	United Check Cashing	4601808

All in violation of Title 18, United States Code, Sections 2314 and 2.

COUNTS SEVEN THROUGH ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this Indictment:

1. Santa Barbara Bank & Trust was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 18169.

2. From at least in or around August 2002 through on or about February 7, 2003, at Bensalem and Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**HAROLD J. McCOY, III,
a/k/a “Hop,” and
KARYNN R. LONG**

knowingly executed and attempted to execute, and aided and abetted the execution and attempted execution of, a scheme to defraud Santa Barbara Bank & Trust and to obtain monies owned by and under the care, custody, and control of the Bank & Trust, by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendants HAROLD J. McCOY, III, and KARYNN R. LONG, and others known and unknown to the grand jury stole identity information of an individual known to the grand jury and identified here as M.H. and used that information to produce counterfeit cashier's checks that appeared to be drawn on the account of Santa Barbara Bank & Trust and that were made payable to M.H. for \$2,311.00.

4. On or about each of the dates as described below, defendant HAROLD J. McCOY, III attempted to cash and cashed each of the counterfeit cashier's checks for \$2,311.00

by presenting an Ohio photographic identification card in the name of M.H. with the photograph of McCOY:

<u>COUNT</u>	<u>DATE</u>	<u>LOCATION</u>	<u>CASHING AGENCY</u>	<u>CHECK NUMBER</u>
SEVEN	2/6/03	Bensalem, PA	Check Cashing	4601808
EIGHT	2/6/03	Bensalem, PA	Ace Check Cashing	4601808
NINE	2/6/03	Philadelphia, PA	King Financial Services	4601808
TEN	2/6/03	Philadelphia, PA	United Check Cashing	4601808
ELEVE N	2/7/03	Philadelphia, PA	King Financial Services	4601809

All in violation of Title 18, United States Code, Section 1344 and 2.

COUNTS TWELVE THROUGH SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about each of the dates as described below, at Bensalem and Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**HAROLD J. McCOY, III,
a/k/a “Hop,” and
KARYNN R. LONG,**

with the intent to deceive persons and organizations, knowingly made, uttered, and possessed, and aided and abetted the making, uttering, and possession of, counterfeited and forged securities, that is, five counterfeited and forged cashier’s checks, each for \$2311.00, totaling \$11,555.00, of an organization that operates in and the activities of which affect interstate commerce, that is, the Santa Barbara Bank & Trust:

<u>COUNT</u>	<u>DATE</u>	<u>LOCATION</u>	<u>CASHING AGENCY</u>	<u>CHECK NUMBER</u>
TWELVE	2/6/03	Bensalem, PA	Check Cashing	4601808
THIRTEEN	2/6/03	Bensalem, PA	Ace Check Cashing	4601808
FOURTEEN	2/6/03	Philadelphia, PA	King Financial Services	4601808
FIFTEEN	2/6/03	Philadelphia, PA	United Check Cashing	4601808
SIXTEEN	2/7/03	Philadelphia, PA	King Financial Services	4601809

All in violation of Title 18, United States Code, Sections 513 and 2.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One through Sixteen of this indictment, defendants HAROLD J. McCOY, III, KARYNN R. LONG, and DANIELLE BAKER:

a. Committed offenses in which the intended loss exceeded \$400,000, as described in U.S.S.G. § 2B1.1(b)(1).

b. Committed offenses involving 50 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(B).

c. Committed offenses in which the defendants relocated, and participated in relocating, a fraudulent scheme to another jurisdiction to evade law enforcement and regulatory officials, as described in U.S.S.G. § 2B1.1(b)(8).

d. Committed offenses involving the unauthorized transfer and use of any means of identification unlawfully to produce and obtain any other means of identification, as described in U.S.S.G. § 2B1.1(b)(9)(C)(i).

e. Committed offenses involving the possession of 5 or more means of identification that unlawfully were produced from, and obtained by the use of, another means of identification, as described in U.S.S.G. § 2B1.1(b)(9)(C)(ii).

f. Committed offenses which caused and risked substantial non-monetary harm, i.e., disruption of the victims' financial positions and records and the region's blood collection process, meriting an upward departure, as described in U.S.S.G. § 2B1.1 Application Note 15(ii).

2. In committing the offenses charged in Counts One through Sixteen of this indictment, defendant HAROLD J. McCOY, III, committed offenses in which he was an organizer and leader of a criminal activity that involved five or more participants and was otherwise extensive, as described in U.S.S.G. § 3B1.1(a).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney